

From: <lucyand@mcn.org>
To: <bos@co.mendocino.ca.us>
Date: 8/6/2017 11:30 PM
Subject: Cannabis ordinance

Hello,

Thank you for being willing to revisit the cannabis ordinance. I have a few concerns. When this process first began I understood it was the intention of the BOS to include & protect the small 'mom & pop' or cottage gardens. But the existing ordinance basically benefits only wealthy farmers and effectively excludes small growers. In the North County, since the mills closed, the small growers have been the main economic support of our communities.

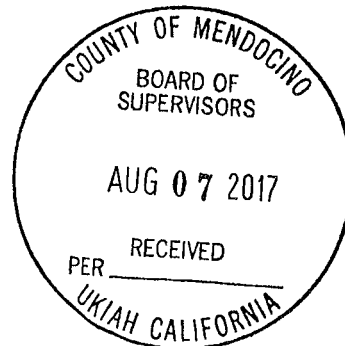
I suggest

1. Lower the fees and the requirements for small cottage gardens. Perhaps a minimal fee of \$100 for up to 25 plants (or an equivalent area).
2. Allow small growers to use existing sheds or greenhouses to dry their cannabis. (Most of us can not afford to build a commercial drying shed). Eliminate the ADA requirement for grows with 3 or less employees.
Allow PortaPotties if necessary. Most folks I know just let their helpers use the toilet in the house.
3. Exempt small greenhouses and hoop houses from the 'commercial' requirement.
4. Create or allow some entity like FloCanna to collect, test, process & distribute cannabis from small growers.
Either the entity or the grower would then pay the taxes. This would greatly simplify the process and could still fulfill 'track & trace' requirements.

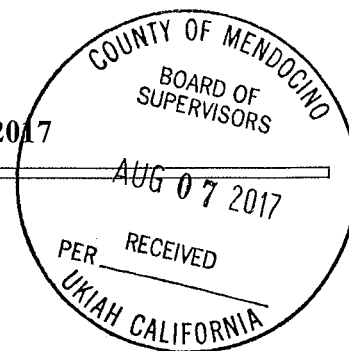
Lastly, I am concerned that the ordinance prohibits so many legitimate medical patients from being able to grow their medicine outside in the sunshine. I understand that there are a lot of people who don't want to see it or smell it but it seems that there must be a fair compromise so that the folks who most need it can grow their own.

Thank you so much for trying so hard to make this work. And for listening.

Lucy Andrews
707-984-6849
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Board of Supervisors - Public Comment for BOS Meeting August 8, 2017



From: Jed Davis <jedasiah@gmail.com>
To: John McCowen <mccowen@co.mendocino.ca.us>
Date: 8/7/2017 7:14 AM
Subject: Public Comment for BOS Meeting August 8, 2017
Cc: Carre Brown <browncj@co.mendocino.ca.us>, Dan Gjerde <gjerde@co.mendocin...>

Dear Honorable Board Members:

I know that the Board of Supervisor and County staff are working hard to make this ordinance functional for everyone, which is no easy task. There are a number of things that have been put in to the ordinance that are not practical from a growing standpoint, are not applied equally to other agricultural as well as regular business, or are simply very difficult for growers to overcome in order to become fully compliant. I know that the absolute goal is to bring as MANY people as possible into compliance. Ultimately we would like to see the fabric and economic engine of our county preserved for everyone who has depended on cannabis as a way of life.

I would like to address a number of issues that need some serious reconsideration or contemplation.

1) **Light wattage restriction for nurseries:** I understand the desire for power usage restriction, but to create a limit that does not make practical growing sense keeps the grower from effectively using their space and equipment according to standard industry practices. For nurseries, the 35-watt/shelf restriction is a major issue that does not get the result that was intended. The reason why is because clone nurseries DO NOT use High Intensity Discharge (HID) lights (which pull a lot of power (amps)), these lights are too powerful and too hot for the delicate cuttings which have not yet grown roots. Clone nurseries use fluorescent lights that produce high wattage for their very little power (amps) usage. Each 54-watt light is 4' long and uses only .2 amps. A 1000watt HID uses 9.8 amps. It would take 49 54w fluorescent lights to equal 1 1000w HID grow light. Cloning racks generally use 1-4 4' fluorescent lights per 4' shelf. Please remove this restriction so that clone nurseries can perform their job using the industry standard, low power equipment that we have always used.

2) **35-watt per square foot restriction for indoor:** This restriction is also too low. Again, I understand its purpose, but it is an arbitrary number chosen to restrict power use, and does not allow indoor growers to effectively grow at industry standard levels. Industry standard for growing indoor is 1 1000-watt light per 4x4 area (16 square feet), which equates to 62.5 watts per square foot. Yields and quality will diminish with 35 watts per square foot. Because of the 35-watt limitation, unlike outdoor growers who calculate their total canopy area (not including walkways), indoor growers are using their TOTAL grow area (including walkways and work areas) so that they

can have the proper amount of wattage over the plant canopy. Perhaps this is why there are so few indoor growing permits applications. Indoor growers are ALWAYS looking for ways to cut energy consumption, but not to the point of sacrificing yield and quality. If more efficient equipment enters the marketplace that is just as effective, growers will surely make the switch. I would encourage you to adopt a wattage number of 65 that is in line with industry standards and would allow indoor growers to calculate their grow area as plant canopy in the same way the outdoor growers are calculating their grow area and maintain competitiveness with indoor grows throughout the state.

3) Road Easement Permission Amendment: It seems that requiring an applicant to get permission from their neighbor if they use an easement to access their property puts a lot of control in neighbor's hands of how one uses their property. While being a "good neighbor" is ALWAYS a good policy, getting permission from a neighbor in order to participate in a legal and permitted commercial activity seems a problematic. In order to find a solution to this issue, we must look at how road sharing has been applied across all businesses. Logging, livestock, orchards, vineyards, vacation rentals, construction, and any other commercial endeavor that might increase traffic on an easement through a neighbors property or shared road. Do these other businesses require a neighbor's permission in order to operate? I would encourage the Board to create a policy that addresses increased traffic and road maintenance responsibility guidelines when easements or shared roads are being used to access permitted grow properties. In creating this policy, look at how these issues are being mitigated across all commercial activities in which roads are shared.

4) Upgrading to Commercial Buildings: Many growers will not able to get a permit because buildings that have been used for years need to be upgraded to commercial standards. I ask the BOS to consider giving growers a 2-3 year period to bring existing buildings into commercial building code compliance. The same time frame might be applied to existing grow properties that require a number of different types of upgrades such as paved parking areas, walkways, septic systems etc. This would allow the growers to focus on keeping their businesses afloat amid a barrage of changing regulations and market conditions while having a reasonable amount of time to make the changes necessary to be in full compliance as a commercial business.

5) Rangeland: It makes no sense that cannabis is the only plant that cannot be grown on parcels in which the permitted uses for their zoning designation is Row Crops, Orchard Crops, General Agriculture, Propagation, and Animal Husbandry! It makes even less sense that the reason stated for this restriction is "land preservation" when ¼ acre is the maximum size grow being permitted for cannabis. Orchards, vineyards, row crops and grazing animals use large amounts of acreage. To say a cannabis grower is destroying the land when they are using only ¼ acre seems ludicrous and prejudicial.

A large portion of our county is zoned rangeland. Many growers have purchased and moved onto rangeland parcels due to their reclusiveness and privacy in order to grow cannabis without bothering others. To say that if THEY discontinue their growing in the future, their property can NEVER be grown on again, you have taken people who purposefully located themselves away from other in order to not interfere with others, and made it impossible for them to sell their property for comparable value since they can't sell the primary use of the property with the property. This will lead to a reduction in property their values and tax revenue for the county as well as potential lawsuits from property owners who have realized that their earning potential and property values are both diminished.

6) Create a Citizen's Advisory Board: The current structure of amending the ordinance through the Board of Supervisors may not be the most conducive structure as it is very limiting for the

grower and non-grower to convey information to the policy makers when our communication is limited to 3 minutes of public expression once per month or letter writing when the Board is busy with numerous other agenda items. The creation of a Citizen's Advisory Board would allow for a group to spend the necessary focused time and attention on these issues in order to come up with solutions that would make the ordinance the best it could be.

Thank you for your consideration on these issues.

Sincerely,

Jed Davis

Board of Supervisors - Fwd: Amendment to cannabis ordinance

From: Nicole French
To: Board of Supervisors
Date: 8/7/2017 8:28 AM
Subject: Fwd: Amendment to cannabis ordinance

>>> Carmel Angelo <angeloc@mendocinocounty.org> 8/6/2017 10:50 PM >>>
Share with the Board. Thanks.

Sent from my iPad

Begin forwarded message:

From: "Josh Loebel" <jomolo420@gmail.com>
Date: August 4, 2017 at 9:34:32 AM PDT
To: "Carmel Angelo" <angeloc@mendocinocounty.org>
Subject: Amendment to cannabis ordinance



I would like too express my concern and disappointment in the proposed amendment to the ordinance that would require me too ask for permission from my neighbor too farm my own land!! I live on a private road that has one lane access at points. I participated in the 9.31 program last year.

I have followed the guide lines set by the county and have worked diligently with local officials and staff to obtain this local permit .

If this amendment should pass it will have a MAJOR ripple effect in the Mendocino economy !!! I currently employee on the books several family's that depend on this farm for their livelihood! They our residents of Mendocino and also have participated in the process too obtain working status within the guide lines of the county .

This policy will send a message that Mendocino is not open for business !!! Bad policy equals bad business !! I strongly encourage you too vote against this amendment and consider the negative impact it will have on the local economy.

Thank you .
Joshua Loebel (voter)
Woodman creek
Sent from my iPhone